

**From:** Jamison Williams <cheezerj7@yahoo.com> on 04/06/2004 04:10:58 PM  
**Subject:** Regulation BB - Community Reinvestment Act

>April 6, 2004

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>Docket No. 04-06

>Communications Division

>Public Information Room, Mailstop 1-5

>Office of the Comptroller of the Currency

>250 E St. SW,

>Washington 20219

>

>Docket No. R-1181

>Jennifer J. Johnson

>Secretary

>Board of Governors of the Federal Reserve System

>20th Street and Constitution Avenue, NW

>Washington DC 20551

>

>Robert E. Feldman

>Executive Secretary

>Attention: Comments

>Federal Deposit Insurance Corporation

>550 17th St NW

>Washington DC 20429

>

>Regulation Comments, Attention: No. 2004-04

>Chief Counsel's Office

>Office of Thrift Supervision

>1700 G Street NW

>Washington DC 20552

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>Dear Officials of Federal Bank and Thrift Agencies:

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>I am a concerned citizen writing to urge you to WITHDRAW the currently  
>proposed changes to the Community Reinvestment Act (CRA) regulations.

>

>CRA has been instrumental in increasing access to homeownership,  
boosting

>economic development, and expanding small businesses in the nation's

>minority, immigrant, and low- and moderate-income communities.

However,

>the proposed changes are contrary to the CRA statute because they will

>halt the progress made in community reinvestment and undermine its  
purpose.

>

>The proposed changes will eliminate the investment and service parts of

>the CRA exam for banks and thrifts with assets between \$250 and \$500

>million. This would reduce the rigor of CRA exams for 1,111 banks that

>account for more than \$387 billion in assets. These not-so-small banks

>may seem insignificant in the comparison with prominent megabanks, but

>they have a huge impact on the communities they serve. In turn,

>communities deserve the right to have those! banks monitored and, if

>necessary, disciplined for neglectful and harmful behavior. It is

>imperative that banks fulfill their public obligation to serve ALL of

>their community, without fair exclusion and without predatory practices.

>Limiting the means by which you can monitor this is unacceptable and

>contradictory to the original purpose of CRA.

>

>The changes also contain an "anti"-predatory lending standard that will

>actually perpetuate abusive lending. In this proposal, the new definition

>of "predatory" is very narrow and, ultimately, CRA exams will allow

>abusive lending as packing fees into mortgage loans, high prepayment

>penalties, loan flipping, mandatory arbitration, and other numerous abuses

>won't be considered "predatory". Rigorous fair lending audits and severe

>penalties on

>CRA exams for abusive lending are NECESSARY in order to ensure that the

>new minority homeowners served by the Administration are protected.

Yet,

>the proposed predatory lending standard will NOT provide these necessary

>protections.

>

>CRA is too vital to be gutted by harmful regulatory changes and

>neglect. Please help save our communities by withdrawing these harmful

>proposed changes. I thank you for your attention to this critical matter.

>

>Sincerely,

Jamison Williams

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